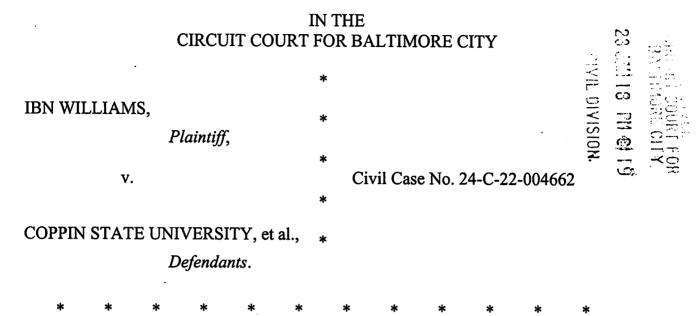
## **EXHIBIT 9**



# DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendants, Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the "University Defendants"), by their undersigned counsel, respectfully request an extension of time to file their response to the Complaint until all University Defendants have been properly served, and state as follows:

1. Plaintiff, Ibn Williams, filed a five-count complaint against the University Defendants and Lucien Brownlee asserting claims of negligence, negligent hiring and retention, negligent infliction of emotional distress, intentional infliction of emotional distress, and breach of contract relating to their management of the Coppin State University basketball program, and those in positions of authority over the basketball program, while he was a student-athlete on the basketball team.

- 2. Plaintiff attempted to effect service on the University Defendants, but did not effect service properly. On December 1, 2022, by email and telephone, undersigned counsel informed Plaintiff's counsel that service had not been effected upon any of the University Defendants, and provided information about how to effect service properly on each of them.
- 3. Thereafter, on December 22, 2022, Plaintiff perfected service upon Defendant Derek Carter and the Office of the Attorney General (with respect to Count V for breach of contract).
- 4. On the same date, service was attempted upon the State Treasurer's Office for the tort claims (Counts I-IV), as required by Md. Code Ann, State Gov't §12-108. However, on December 27, 2022, the State Treasurer's Office informed Plaintiff's counsel that service was not proper and was therefore rejected, as the summons was not directed to the State Treasurer.
- 5. On January 11, 2023, service was properly effected upon Defendant Juan Dixon.
- 6. To date, Plaintiff's counsel has requested that the clerk issue a new summons directed to the State Treasurer, and has indicated that once issued, service will be effected promptly upon the State Treasurer with respect to Counts I-IV.
- 7. It would conserve the parties' and the Court's resources, and avoid duplicative filings, for the University Defendants, all of whom will be represented by undersigned counsel, to file a single responsive pleading to the Complaint after the State Treasurer's Office has been served, rather than filing multiple responses on different dates.

- 8. The University Defendants submit that this request will not cause undue delay or prejudice.
  - 9. Plaintiff's counsel consents to this request.

WHEREFORE, the University Defendants respectfully request that the Court extend the deadline for the University Defendants to file a responsive pleading to the Complaint until thirty (30) days after Plaintiff has perfected service upon the State Treasurer, at which time the University Defendants will file a single responsive pleading. A proposed Order is attached.

Respectfully submitted,

ANTHONY G. BROWN Attorney General of Maryland

/s/ Ariel Lichterman

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January 18, 2023

Attorneys for Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon

#### **CERTIFICATE OF SERVICE**

I certify that, on this 18th day of January, 2023, the foregoing was served by firstclass mail and email on all persons entitled to service:

Peter Anderson, Esq.
Kayann Chambers, Esq.
Morgan & Morgan
1901 Pennsylvania Ave. N.W., Suite 300
Washington, DC 20006
panderson@forthepeople.com
kschambers@forthepeople.com

/s/ Ariel Lichterman	
Ariel Lichterman	

## IN THE CIRCUIT COURT FOR BALTIMORE CITY

\*

IBN WILLIAMS,

\*

Plaintiff,

Civil Case No. 24-C-22-004662

\*

COPPIN STATE UNIVERSITY, et al.,

v.

Defendants.

\* \* \* \* \* \* \* \* \*

### **PROPOSED ORDER**

Upon consideration of the Consent Motion for Extension of Time to File a Responsive Pleading filed by Defendants Coppin State University, the University System of Maryland, the State of Maryland, Derek Carter, and Juan Dixon, (collectively the "University Defendants"), and good cause appearing therefore, it is this \_\_\_\_\_ day of January, 2023, ORDERED:

That the University Defendants' Motion for Extension of Time is hereby GRANTED; and

The University Defendants shall file a single response to the Complaint within thirty (30) days after proper service of the Complaint upon the State Treasurer.